

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY
Caption in compliance with D.N.J. LBR 9004-1(b)

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Counsel to Arnold & Itkin LLP

In re:

LTL MANAGEMENT LLC,

Debtor.¹

Chapter 11

Case No. 23-12825 (MBK)

Hearing Date and Time:

August 2, 2023 at 10:00 a.m. ET

**NOTICE OF MOTION TO SEAL THE REDACTED PORTIONS
OF POST-TRIAL BRIEF IN SUPPORT OF MOTION OF ARNOLD & ITKIN, ON
BEHALF OF CERTAIN TALC CLAIMANTS, TO DISMISS CHAPTER 11 CASE**

PLEASE TAKE NOTICE that Arnold & Itkin LLP (“Arnold & Itkin”), on behalf of certain talc personal injury claimants represented by Arnold & Itkin, by and through its counsel, will move (the “Motion to Seal”) on August 2, 2023 at 10:00 a.m. (ET) (the “Return Date”) before the Honorable Michael B. Kaplan, United States Bankruptcy Judge, at the United States Bankruptcy Court, Clarkson S. Fisher U.S. Courthouse, 402 East State Street, Trenton, New Jersey 08608, pursuant to sections 105(a) and 107(b) of title 11 of the United States Code, 11 U.S.C. §§ 101-1532 (the “Bankruptcy Code”), Rule 9018 of the Federal Rules of Bankruptcy

¹ The last four digits of the Debtor’s taxpayer identification number are 6622. The Debtor’s address is 501 George Street, New Brunswick, New Jersey 08933.

Procedure (the “Bankruptcy Rules”), and D.N.J. LBR 9018-1 (the “Local Rules”), for authorization to file under seal the redacted portions of the post-trial brief in support of Arnold & Itkin’s motion to dismiss the Debtor’s chapter 11 case.

PLEASE TAKE FURTHER NOTICE that, Arnold & Itkin shall rely upon the application filed herewith in support of the Motion to Seal, and that no brief is being filed herewith since the legal basis upon which relief should be granted is set forth in the supporting application filed with the Motion to Seal.

PLEASE TAKE FURTHER NOTICE that, pursuant to D.N.J. LBR 9013-2 and the Order Establishing Case Management and Administrative Procedures [Docket No. 554] (the “Case Management Order”), responsive papers, if any, must be filed with the Clerk of the Bankruptcy Court, Clarkson S. Fisher Courthouse, 402 East State Street, Trenton, New Jersey 08608, and served upon (a) undersigned counsel to Arnold & Itkin, (b) the Debtor’s counsel, (c) counsel to the Official Committee of Talc Claimants, (d) the legal representative for future talc claimants and her counsel, (e) counsel to the Ad Hoc Committee of Supporting Counsel, (f) the Office of the United States Trustee for the District of New Jersey and (g) the other parties on the Master Service List established by the Case Management Order no later than seven (7) days prior to the hearing.

PLEASE TAKE FURTHER NOTICE that, unless an objection is timely filed and served, the Motion to Seal will be deemed uncontested in accordance with D.N.J. LBR 9013-3(d) and the relief may be granted without a hearing.

Dated: July 19, 2023

PACHULSKI STANG ZIEHL & JONES LLP

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